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December 17, 2003

Thomas M. Dorman, Esq.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

RECEIVED

DEC 18 2003

Re: Case No. 2003-00396

Dear Mr. Dorman:

Please find enclosed the original and twelve copies of the Supplemental Data Requests of Kentucky Industrial Utility Customers, Inc. to LG&E and KU filed in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document of file.

Very Truly Yours,


Michael L. Kurtz, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Attachment

cc: Certificate of Service
Richard Raff, Esq.

CERTIFICATE OF SERVICE

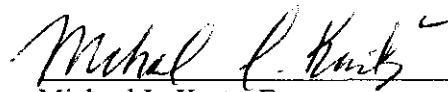
I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 27th day of October, 2003.

F. Howard Bush
Manager, Regulatory Compliance
Louisville Gas and Electric Company
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Louisville, KY 40232-2010

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Attorney at Law
225 Capital Avenue
Frankfort, KY 40601


Michael L. Kurtz, Esq.

DEC 18 2003

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

Tariff Filing of Kentucky Utilities Company and Louisville Gas and Electric Company for Non-Conforming Load Customers :
: Case No. 2003-00396

**SUPPLEMENTAL DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO LOUISVILLE GAS & ELECTRIC COMPANY and
KENTUCKY UTILITIES COMPANY**

Dated: December 17, 2003

DEFINITIONS

1. "Document" means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. "Person" means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company's possession or subject to its control, state what disposition was made of it?
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. "And" and "or" should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. "Each" and "any" should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. "You" or "your" means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.
11. "LG&E" means Louisville Gas & Electric Company and/or any of their officers, directors, employees, or agents who may have knowledge of the particular matter addressed.
12. "KU" means Kentucky Utilities Company, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total company as well as Intrastate data, unless otherwise requested.

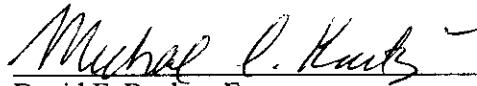
KIUC's SUPPLEMENTAL DATA REQUESTS TO LG&E & KU
PSC CASE NO. 2003-00396

1. Please refer to your response to KIUC #5. Please list the names of the 20 largest customers that correspond with the kW demand. The information requested here is similar to that which you are required to file annually with FERC under 18 CFR 46.3 and which is publicly available.
2. In your response to KPSC #3, you state: "All of the Company's existing power rate schedules are based on firm service. So is NCLS. This is a firm service rate." However, in response to KIUC #8, you explain how and why you propose to interrupt NCLS customers on a different basis than other firm service customers. Please reconcile these statements.
3. Please refer to KIUC #8(b). You state that unlimited 10 minute interruptions for NCLS customers during system contingencies is a "fair exchange for allowing NCLS customers to utilize the majority of load following capability of LG&E/KU's generators."
 - a. Over the course of an average year, how many 10 minute interruptions of NCLS customers do you project? Please provide support for your projection.
 - b. In order to meet a system contingency, would you interrupt a non-firm, off-system sale customer before interrupting an NCLS customer?
 - c. Do you agree that in addition to unlimited 10 minute interruptions an NCLS customer is subject to a five minute billing demand in exchange for load following? Please explain.
 - d. For each month of the last five years please list the number of system contingencies which would have resulted in calling a NCLS 10 minute interruption.
4. Please refer to your response to KIUC #10.
 - a. Explain how NAS could modify its process to minimize its 5 minute peak load.

5. Please refer to your response to KPSC #5.

- a. For each month since the NAS electric arc furnace has been in operation, please indicate:
 - i. Each time KU has been required to purchase Automatic Reserve Sharing power at a cost of \$100/mWh;
 - ii. The length of the purchase; and
 - iii. The total dollar amount of the purchase.

Respectfully submitted,



David F. Boehm, Esq.

Michael L. Kurtz, Esq.

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**COUNSEL FOR KENTUCKY INDUSTRIAL
UTILITY CUSTOMERS, INC.**

December 17, 2003